



**COUNCIL OF
THE EUROPEAN UNION**

**Brussels, 24 October 2013
(OR. en)**

**15166/13
ADD 2**

**Interinstitutional File:
2011/0435 (COD)**

**CODEC 2342
ETS 47
MI 905
COMPET 740
EDUC 402**

"I/A" ITEM NOTE

From: General Secretariat of the Council

To: Permanent Representatives Committee/Council

Subject: Proposal for a Directive of the European Parliament and of the Council amending Directive 2005/36/EC on the recognition of professional qualifications and Regulation (EU) No 1024/2012 on administrative cooperation through the Internal Market Information System ('the IMI Regulation') (**first reading**)

- Adoption of the legislative act (**LA + S**)
- = Statement

Statement by Bulgaria

Bulgaria is voting *abstention* in respect for Art. 46 of the Proposal for a Directive of The European Parliament and of The Council amending Directive 2005/36/EC on the recognition of professional qualifications, with reference to the duration of architects' training, on the following grounds:

The opinion of the Republic of Bulgaria is that an acceptable standard is attained for the *architect* profession in terms of knowledge, skills and competences via a combination of an academic education and professional experience in accordance with the international standard for at least 5 years of full-time study at a university or a comparable educational institution, leading to successful completion of a university-level examination for acquisition of qualification and at least two years of professional traineeship, which is certified, respectively, attested to by a certificate issued from the competent authority. Bulgaria emphasizes that it is the application of that international standard that allows for an automatic recognition of the *architect* professional qualification and the related minimum training duration and supplement of the academic education with professional experience.

The *architect* profession is one of the professions having a direct impact over people's lives and health. The building designs, which are elaborated by architects, should guarantee to the society that the constructions resulting from those designs will comply with the regulatory requirements and technical specifications for ensuring building sustainability and durability in operational and seismic loading, will provide a safe building operation exploitation and fire safety, will create a healthy living environment safeguarding people's lives and health, as well as environmental preservation.

Currently, the requirements for knowledge, skills and competences of architects are many times more than what was necessary 15 years ago for practicing the *architect* profession and continue growing, including new fields and disciplines. This basis is attained on an academic level. In this sense, it is not useful to aspire towards a constant reduction of the academic education volume and duration, taking into account the increasing volume of learning outcomes. Bulgaria expresses its apprehension that the minimum regulation will reduce the competitiveness of the European architects on some global markets, because the international standard is five-year academic training.

Bulgaria states its concern over the fact that the precise formulation has not been laid down in the proposed amendments for modernization of Directive 2005/36/EC on the recognition of professional qualifications as regards the common minimum requirements in the direction of establishing a common standardized framework for training in *Architecture* major, as well as standardized requirements for the duration, content and control of the professional traineeship, as well as the absence of traineeship, if there is a five-year duration of training in *Architecture* major. Bulgaria sustains its position regarding the necessity for professional traineeship with a two-year duration, under the supervision of a registered architect or another competent body, because it is exactly this traineeship that provides for practical knowledge in a real working environment for the graduates from *Architecture* major, which is different from the working environment in universities. The traineeship, which is envisaged after the third year of training, cannot be compared in quality with the traineeship under the supervision of a registered architect or a competent body that is carried out after the training completion of *Architecture* major.